

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
AUGUSTA DIVISION**

AMANDA LAWRENCE,

Plaintiff,

v.

GLOBAL LINGUIST SOLUTIONS, LLC,

Defendant.

Case No. 1:12-cv-148-JRH-WLB

DEFENDANT’S MOTION TO DISMISS
PURSUANT TO RULE 12(b)(2), (3), AND (6) OR,
IN THE ALTERNATIVE, TO TRANSFER

Defendant Global Linguist Solutions, LLC (“GLS”), by counsel, hereby moves this Court to dismiss Plaintiff’s Complaint with prejudice in entirety pursuant to Federal Rule of Civil Procedure 12(b)(2) on the grounds that this Court lacks personal jurisdiction over GLS. GLS also moves to dismiss the Complaint with prejudice in its entirety pursuant to Federal Rule of Civil Procedure 12(b)(3) because the parties agreed to litigate in another forum and venue is improper in this Court under both 28 U.S.C. § 1391(b) and 42 U.S.C. § 2000e-5(f)(3). GLS also moves to dismiss the Complaint pursuant to Federal Rule of Civil Procedure 12(b)(6) as to any allegations of gender discrimination under Title VII of the Civil Rights Act of 1964 for failure to state a claim upon which relief can be granted.

Alternatively, any surviving portion of this case should be transferred pursuant to 28 U.S.C. §§ 1404(a) or 1406(a) to the United States District Court for the Eastern District of Virginia, Alexandria Division.

GLS' Motion is supported by the accompanying Memorandum of Law, which is incorporated by reference herein.

WHEREFORE, GLS respectfully requests that the Court enter an order granting its Motion to Dismiss with prejudice, or in the alternative, granting its Motion to Transfer, and entering such other relief as the Court deems just and proper.

Dated: February 8, 2013

Respectfully submitted,

/s/ Charlotte Main

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CERTIFICATE OF SERVICE

I hereby certify that on 8th of February, 2013, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will automatically send notification of such filing to the following attorney of record:

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//s/ Charlotte Main
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